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February 10, 2025

**VIA ECF**

Honorable Jeannette A. Vargas  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**RE: Defendant BAM Trading Services Inc. d/b/a Binance.US' ("Binance.US")  
Consent Motion For Extension of Time Regarding Date to Respond to the  
Amended Complaint, *Troell et al. v. Binance Holdings Ltd. et al.*, Civil Action  
No.: 1:24-cv-07136 (JAV)**

Dear Judge Vargas,

This law firm represents Defendant Binance.US in the above-referenced action. Pursuant to Local Civil Rule 7.1(e) and Your Honor's Individual Rule 3(E), Binance.US respectfully moves this Court for a short extension of time for it to respond to Plaintiffs' Amended Complaint from the current deadline of February 13, 2025, through and including February 18, 2025. In doing so, Binance.US reserves all its defenses and objections, including as to jurisdiction.

Defendant Binance Holding Limited ("BHL") and Plaintiffs consent to the extension requested by Binance.US provided that the Court extend their deadlines associated with Binance.US' planned motion to dismiss the Amended Complaint so that Plaintiffs' opposition and BHL's supplemental brief deadlines are not shortened. This is Binance.US' third request for an extension of time; the first two extensions related to Binance.US' appearance in the case and all parties' agreement to move certain deadlines to bring the various defendants' motion to dismiss deadlines into alignment.

There is good cause for the requested extension, which is necessary for Binance.US due to an unforeseen temporary personal matter requiring its counsel's immediate attention. This request is made in good faith and will not cause undue delay or prejudice to the proceedings.

Accordingly, Binance.US respectfully requests that the Court extend the deadlines for the parties, to and through, as follows:

February 18, 2025: Binance.US Motion to Dismiss

February 21, 2025: BHL Supplemental Brief



February 10, 2025  
Page 2

March 11, 2025: Plaintiffs' Opposition

March 25, 2025: Binance.US Reply, BHL Reply

Respectfully submitted,

/s/ Alexandra E. Chopin  
Alexandra E. Chopin

*Counsel for Defendant BAM Trading Services Inc.  
d/b/a Binance.US*

cc: Daniel T. Stabile, Esq.  
All counsel of record (w/encls.) (by ECF)